City of Bexley, Ohio

2242 East Main Street, 432Q9 614-235-8694 Fax 235-3420

Gity Gouncil

Anne H. Porter, President Mark R. Masser Helen M. Mac Murray-Mayo Jeffrey L. McClelland Jed W. Morison John B. Rohyans Richard F. Weber James H. Gross, City Attorney Richard A. Levin, Auditor David IC. Sadison, Stayor

October 18, 2000

The Honorable Michael B. Coleman, Mayor C/o Policy Unit City of Columbus 90 West Broad Street Columbus, OH 43215

Dear Mayor Coleman,

The City of Bexley believes that the well being, the continued prosperity, and the quality of life for the entire Columbus metropolitan region requires policies and practices that recognize that all jurisdictions within the regional are linked, and that a regional approach to planning and development is essential. For this reason, the City supports and endorses the updated Columbus Metropolitan Sewage Facilities Plan as a plan that will prevent wasteful duplication of infrastructure, and protect the environment by insuring that all sewerage within the region is treated to US Environmental Protection Agency standards.

Bexley hereby requests that the Ohio Environmental Protection Agency certify the Columbus Metropolitan Sewage Facilities Plan as an update to the Areawide Waste Treatment Plan and amend the State's Water Quality Management Plan.

Thank you for your consideration.

Very sincerely,

David H. Madison

Mayor

DHM/sic



Village of Canal Winchester 36 South High Street Canal Winchester, Ohio 43110-1213

September 20, 2000

Ms. Cheryl Roberto, Policy Advisor Office of the Mayor City of Columbus 90 West Broad Street Columbus, Ohio 43215

Re: City of Columbus Metropolitan Facilities Plan Update

Dear Ms. Roberto:

As you are aware, I have provided my support of the above referenced plan. As the operator of the second largest centralized sewer system in Franklin County, Canal Winchester is concerned with alternative wastewater systems, as currently proposed by Franklin County. These concerns include:

- Less safe systems, which require less OEPA regulations;
- Because of the higher construction costs, these systems will promote larger, more dense developments in undeveloped areas;
- Future maintenance and upgrade costs will exceed the user fees, therefore requiring financial support by all residents of Franklin County;

From our discussions, I understand that the City of Columbus recognizes our centralized sewer system and its planning boundaries as part of this plan. This type of joint planning is conducive to a well thought out plan, with the most economical services for all area residents.

Canal Winchester currently serves areas outside of its municipal boundaries. This has assisted us in limiting the number of centralized sewer system in this immediate area. I would likewise urge the City of Columbus to enter meaningful dialogue with Franklin County regarding serving unincorporated areas of Franklin County.

Sincerely,

Marsha Hall

Mayor

Village of Canal Winchester

Office: (614) 837-7493

Fax: (614) 837-0145



CITY OF DUBLIN

Office of the City Manager 5200 Emerald Parkway Dublin, Ohio 43017-1066

Phone/TDD: 614-761-6500 Fax: 614-889-0740 Web Site: www.dublin.oh.us September 14, 2000

The Honorable Michael B. Coleman, Mayor c/o Policy Unit City of Columbus 90 West Broad Street Columbus, Ohio 43215

Dear Mayor Coleman,

On behalf of the City of Dublin and its over 30,000 residents, I support and endorse the updated Columbus Metropolitan Sewage Facilities Plan.

Our City has long recognized that a central sewer system is the best technology to provide safe and dependable services to our residents. We have invested over \$20 million into our facilities, in the recent past. This plan will protect that investment.

My staff and I have reviewed the updated plans and find them to be consistent with the needs of our community and acceptable to the citizens of the City of Dublin.

We request that the Ohio EPA certify this plan to the U.S. EPA as an update to the Area Wide Waste Treatment Plan, amending the State's Water Quality Management Plan, within the earliest possible time frame.

Respectfully,

Timothy C. Hansley City Manager

Josansle

TCH/mc

200 SOUTH HAMILTON ROAD GAHANNA, OHIO 43230-2996



(614) 471-6009 Fax (614) 337-4381 Web Site: www.gahanna.org

September 12, 2000

Michael B. Coleman, Mayor City of Columbus 90 West Broad Street Columbus, OH 43215

Dear Mayor Coleman:

We are so thankful for the Central Ohio Gravity Sewer System managed by the City of Columbus. It has resulted in such wonderfully clean water in the whole Central Ohio area. Our Big Walnut Creekside is a beach. Children wade and splash in Big Walnut Creek throughout the summer. The EPA tests of Big Walnut have found it to be an extraordinarily clean stream. This has a great deal to do with the Columbus Sewer System and the elimination of human wastes seeping into surface waters.

Land application sewage systems are an excellent way for small isolated hamlets to correct failing septic systems within their boundaries. The cost of an underground gravity sewer system and treatment facility simply does not make sense for these small isolated rural towns. Land application is a perfect alternative for such areas. It does not make sense, however, for a large metropolitan area such as Franklin County.

We fully support our centralized sewer collection and treatment system, which has resulted in clean waters for our people. We thank you for the good management that Columbus is providing.

Sincerely,

James F. McGregor

Mayo

JFM/psf

The City of Grove City, Ohio OSEP11AM1045RECD MAYORS OFF

P.O. Box 427 · 4035 Broadway · Grove City, Ohio 43123-0427 (614) 277-3000

CHERYL L. GROSSMAN Mayor

September 8, 2000

The Honorable Michael B. Coleman City of Columbus City Hall / 90 West Broad Street Columbus, Ohio 43215-9014

Dear Mayor Coleman:

Upon review of the updated Columbus Metropolitan Sewage Facilities Plan, I support this plan on the basis of future growth on behalf of the City of Grove City as well as the Central Ohio community.

I believe that the plan is responsive to the concerns of household sewage disposal systems, alternative wastewater systems and centralized wastewater treatment and their ultimate conclusion. It also allows for the suburbs to continue to grow when Columbus and the suburbs jointly agree.

I feel the Facilities Plan Update is sensitive to the interests of regional stakeholders.

Sincerely,

Cheryl L. Grossman

CLG:ds

C: Richard Stage, City Administrator Council Members, City of Grove City

fax 836-1953 www.groveport.org

August 30, 2000

The Honorable Michael Coleman, Mayor c/o Policy Unit City of Columbus 90 West Broad Street Columbus. Ohio 43215

Dear Mayor Coleman:

I am writing on behalf of the Village of Groveport in support of the Columbus Metropolitan Sewage Facilities Plan Update. I recently met with City of Columbus Department of Public Utilities Director John Doutt and Policy Advisor Cheryl Roberto regarding the draft Plan. I appreciated the opportunity to meet with them and discuss the Plan before its submittal to the Ohio Environmental Protection Agency. As with most suburbs of Columbus, Groveport is facing a great deal of growth and, consequently, must plan for the increased population and related needs, such as infrastructure. Beyond the health safety benefits of a centralized sewer system, the Sewage Facilities Plan will help to control the growth patterns within the facility planning boundary area.

Specifically, the Village is in support of the provision to exclude the use of alternative wastewater treatment systems, primarily due to the lack of control over community growth issues that these systems would present. A community, such as Groveport, with approximately 4,000 Residents could be severely impacted by the development of a large subdivision based on an alternative wastewater treatment system. Recent subdivision proposals in the Columbus Metropolitan Area that have included alternative systems have as many as 1,200 new homes. If located just outside of the Village of Groveport, a similar subdivision would double the number of houses in our area without any input from the Village.

Again, the Village of Groveport is in support of the Columbus Metropolitan Sewage Facilities Plan Update and I thank you for the opportunity to be involved in the process. If you need to contact me for any reason, please feel free to call me at (614) 836-5301.

Sincerely.

Anthony J. Bales Village Administrator

utty / Bel

C: Mr. John Doutt, P.E., City of Columbus Ms. Cheryl Roberto, City of Columbus



City of Hilliard

3800 Municipal Way • Hilliard, Ohio 43026-1696 • Municipal Offices (614) 876-7361

September 6, 2000

Ms. Cheryl Roberto Office of the Mayor City of Columbus 90 West Broad Street Columbus, Ohio 43215

Re:

Facilities Plan Update

Division of Sewerage and Drainage

Dear Ms. Roberto:

We have reviewed the above document and have no review comments. The CD-ROM version is well presented, understandable to non-technical persons, and informative. We support the centralized sewer concept and appreciate the section of the report that addresses the multiple problems associated the land application alternative.

Thanks you for the opportunity to review the update. If we can be of further service, please do not hesitate to call.

Sincerely,

CITY OF HILLIARD

Gregory E. Ewans, P.E. Director of Public Service

copy: Mayor Ward

Randy Bowman, P.E., City Engineer

Colleen H. Briscoe, Mayor 99 W. Main Street P.O. Box 188 New Albany, OH 43054



Phone 1-614-855-3913 Fax 1-614-855-8583

The Honorable Michael B. Coleman, Mayor c/o Policy Unit City of Columbus 90 West Broad Street Columbus, Ohio 43215

Dear Mayor Coleman:

As Mayor of New Albany, I know that centralized sewer is not only the best technology but also the only dependable method of safeguarding the environment and the health of residents in areas such as Central Ohio.

A plan of centralized sewer service will insure that those communities, like the Village of New Albany, that have invested in and are continuing to invest in infrastructure to provide sewer to their residents will be protected from less effective and less reliable means of wastewater disposal.

Sincerely,

Colleen H. Briscoe

Mayor, Village of New Albany



Village of Obetz 1611 Chillicothe Street Obetz, Ohio 43207 (614) 491-1080 FAX 491-7507

Louise Crabtree *Mayor*

August 23, 2000

The Honorable Michael B. Coleman, Mayor City of Columbus
90 West Broad Street
Columbus, Ohio 43215

Dear Mayor Coleman,

On behalf of the Village of Obetz and the 4,100 residents, I strongly support and endorse the updated Columbus Metropolitan Sewage Facilities Plan. The Village has invested many dollars into a facility plan over many years that allows for "smart growth" of our community and for the protection of our environment now and into the future. I have reviewed the updated plans and find then to be acceptable to the citizens of the Village.

I believe that this updated Columbus Metropolitan Sewage Facilities Plan is a win/win opportunity for the Village of Obetz and soundly recommend the approval by the EPA.

Respectfully,

Louise Crabtree

Laure W. Chaltree

Mayor



City of Lickerington

September 21, 2000

The Honorable Michael B. Coleman, Mayor City of Columbus c/o Cheryl Roberto Policy Advisor 90 West Broad Street Fourth Floor Columbus OH 43215

Dear Mayor Coleman:

I would like to thank John Doutt and Cheryl Roberto for taking the time to meet with our staff to discuss the City of Columbus' proposed Metropolitan Facilities Plan update. The City of Pickerington supports the concept of the proposed regional wastewater management plan. We agree that the potential for environmental contamination and urban sprawl can be minimized by requiring connection to centralized sewer systems.

City officials and staff have reviewed the draft document which you submitted to us, and we recommend the following changes:

• Page 2, Section II. Alternative Wastewater Systems

We would like to see a clear definition of "alternative wastewater systems", since the current language is open-ended.

Also, we suggest that the last line of the paragraph say "No alternative wastewater systems shall be installed or operated within the Facilities Plan Area Boundary unless such system meets the criteria required to receive an NPDES permit."

Page 3, Section III. A. City of Columbus Sewer System

The second paragraph of Section A needs to be clarified. We believe that the second sentence in the paragraph is meant to be explanatory but it appears to be contradictory. We think the intent is to say that developed properties may continue to use septic or alternative systems even if they are within 200 feet of a sewer line, but that if they need expanded sewer services they need to connect to the sewer line at that time.

The language of this section is mirrored in Sections III. B. 2,3,4,& 6, and should be clarified in those sections as well.

Page 4, Section III. B. 3. Pickerington Area

The second sentence of the first paragraph should read "Wastewater collected in the City of Pickerington shall be conveyed to Pickerington's existing **and/or future** publicly owned treatment works for treatment and discharge."

The third sentence of the first paragraph should read "Such service shall continue unless or until, Pickerington desires to connect its system to the City of Columbus sewer system or other centralized sewer system."

The last sentence of the first paragraph should read "Such connection shall occur in a manner that is mutually agreeable to the City of Pickerington and the entity owning the centralized sewer system to which the connection is made.

The last sentence of the second paragraph should read "The flows to such existing sanitary facilities **not connected to a centralized system**, however, may not be expanded nor increased.

• Page 5, Section III. B. 6. Fairfield County

The third sentence of the first paragraph should read "Such service shall continue unless or until, the sewer district desires to connect its system to the City of Columbus sewer system or other centralized sewer system."

The last sentence of the first paragraph should read "Such connection shall occur in a manner that is mutually agreeable to the sewer district and the entity owning the centralized sewer system to which the connection is made.

We also request a copy of the map which delineates the service areas addressed in Section III of the plan. We would like to review the final draft of the plan and are reserving a formal endorsement of the plan until we have seen the final draft.

Thank you for considering our comments. We commend your hard work and efforts to establish a cooperative regional wastewater management plan.

Sincerely,

Joyce Bushman

City Manager

cc: Mayor Randall Hughes

City of Pickerington Council Members (7)



Robert L. McPherson, Mayor

September 5, 2000

The Honorable Mayor Michael Coleman c/o Policy Unit City of Columbus 90 West Broad Street Columbus, Ohio 43215

Dear Mayor Coleman:

On behalf of the City of Reynoldsburg and its 32,000 residents, I am happy to say that I support and endorse the updated Columbus Metropolitan Sewerage Facilities Plan. I recently met with the City of Columbus Department of Public Utilities Director John Doutt and Policy Advisor Cheryl Roberto regarding the draft of the plan. I have reviewed the updated plans and find them to be acceptable to the citizens of the City of Reynoldsburg.

I believe this updated Plan is a win/win opportunity for the City of Reynoldsburg and highly recommend the approval by the Ohio Environmental Protection Agency.

I thank you for the opportunity to be involved in the process. If you need to contact me for any reason, please feel free to call me at (614) 866-9609.

Sincerely,

Robert L. McPherson

Mayor

RLM:mm

c:file

Mr. John Doutt, P. E., City of Columbus Ms. Cheryl Roberto, City of Columbus

VILLAGE OF RIVERLEA

P.O. Box 191 Worthington, Ohio 43085 - 0191 (614) 885 - 3567

September 01, 2000

The Honorable Michael B. Coleman, Mayor c/o Policy Unit City of Columbus 90 West Broad Street Columbus, Ohio 43215

Dear Mayor Coleman,

On behalf of the Village of Riverlea and its 515 residents, I support and endorse the updated Columbus Metropolitan Sewage Facilities Plan.

Our Village has long recognized that a central sewer system is the best technology to provide safe and dependable services to our residents. This plan will protect the investment we have made in our infrastructure.

My staff and I have reviewed the updated plans and find them to be consistent with the needs of our community and acceptable to the citizens of the Village.

We request that the Ohio EPA certify this plan to the U.S. EPA as an update to the Areawide Waste Treatment Plan, amending the State's Water Quality Management Plan, within the earliest possible time frame.

Respectfully,

Patricia A. Anderson, Mayor

Mayor Jerry O'Shaughnessy Ph.(614) 889-2824 Fax: (614) 889-2053 E mail: OShaughnessy@shawneehillsoh.com

October 20, 2000

The Honorable Michael B. Coleman, Mayor C/o Policy Unit City of Columbus 90 West Broad Street Columbus, Ohio 43215

Dear Mayor Coleman:

On behalf of the Village of Shawnee Hills and its 433 residents, I would like to thank you for the opportunity to comment on the updated Columbus Metropolitan Sewage Facilities Plan.

Our Village stands to benefit greatly with the installation of centralized sewers. Not only will we be able to satisfy the environmental issues the Village has faced for years, but the installation of centralized sewers will also provide the Village with economic development opportunities that until now were just not possible, and, are greatly needed.

The Village of Shawnee Hills is a community of 433 citizens, about to spend \$4.1 million on a new wastewater treatment system. We want to ensure that whatever is included in the Facilities Plan Update conforms to the existing contracts and system which we are about to install.

We regard land application plans, such as that currently being implemented in Tartan Fields to our west, as unacceptable to Shawnee Hills. Land application in this part of the United States is a relatively new concept and we feel that there is not enough experience to indicate that it can work successfully in a colder climate such as that in Ohio. Since land application cannot be implemented in winter months, we have some questions and concerns about storing the material in holding ponds and then spreading it all during the warmer months. We also have some concerns about what the replacement costs will be as land application systems wear out and who will pay the replacement costs. Although we do not contemplate the use of land application systems in Shawnee Hills, we are concerned about material being spread in adjacent areas leaching into the soil and affecting the Shawnee Hills water system. If such a scheme were allowed in Shawnee Hills, it could have a negative impact on our ability to

service the debt which the Village will incur with the installation of its wastewater treatment system.

Lastly, we would prefer that the boundary of the management area, as it affects Shawnee Hills, be left where it was in the 1984 update. The proposed boundary conforms with the boundaries of our contract areas, but may not allow for expansion and annexation beyond that currently being planned for the Village. Since we are not certain when the next update will be, we would prefer that the original boundary (the red line) be left in place.

Respectfully.

Jerry O'Shaughnessy

Mayor

Cc: John Doutt, Director of Public Utilities, City of Columbus Anthony J. Celebrezze, Village Solicitor Robert Wood, Public Utilities Chair, Village Council



October 13, 2000

The Honorable Michael B. Coleman, Mayor c/o Policy Unit
City of Columbus
90 West Broad Street
Columbus, Ohio 43215

Dear Mayor Coleman,

On behalf of the City of Upper Arlington and its 35,000 residents, I support and endorse the updated Columbus Metropolitan Sewage Facilities Plan.

Our City has long recognized that a central sewer system is the best technology to provide safe and dependable services to our residents. We have invested millions of dollars into our facilities. This plan will protect that investment.

My staff and I have reviewed the updated plans and find them to be consistent with the needs of our community and acceptable to the citizens of Upper Arlington.

We request that the Ohio EPA certify this plan to the U.S. EPA as an update to the Areawide Waste Treatment Plan, amending the State's Water Quality Management Plan, within the earliest possible time frame.

Respectfully,

Virginia/L. Barney

City Manager



City Manager's Office

September 12, 2000

The Honorable Michael B. Coleman Mayor City of Columbus c/o Policy Unity 90 West Broad Street Columbus, OH 43215

Dear Mayor Coleman:

The City of Westerville continues to support a regionalized, sanitary sewer system as one of the best ways to plan for and manage growth in the Central Ohio community. To that end we endorse the proposed Columbus Metropolitan Facilities Plan Update. As you are aware, the City of Westerville has an agreement with the City of Columbus which accepts and treats our municipality's waste. Our 35,000 residents are stakeholders in the success of the Columbus proposal.

Westerville is particularly encouraged with the proposed Plan's ban on alternative wastewater treatment systems that include land-application methods. Such systems could have a direct negative impact on Alum Creek which is the City's primary source for our water treatment plant.

We are hopeful that the Ohio EPA will support your efforts to sustain the Central Ohio community's environmental and social qualities of life.

Sincerely.

G. David Lindimore

City Manager

SOUTHWEST LICKING COMMUNITY WATER & SEWER DISTRICT

P.O.Box 215 Etna, Ohio 43018 8821 York Road Pataskala, Ohio 43062 Phone (740)927-0410 Fax (740)927-4700

September 25, 2000

Office of the Mayor City of Columbus Policy Unit 90 West Broad Street Columbus, Ohio 43215

Dear Sirs,

The Southwest Licking Community Water and Sewer District is requesting that we be included in your new proposed service area. We are opposed to alternative waste systems and have spent over 45 million dollars to provide wastewater services to our customers. We have 4100 sewer customers and our service area is the fastest growing area in Licking County.

Thank you for the opportunity to review and comment on the proposed Blue Line Revisions. For the record, we are opposed to any of our service area being annexed to Columbus.

Sincerely,

John Stiltner General Manager

Southwest Licking Community Water & Sewer District



The Honorable Michael Coleman Mayor, City of Columbus Columbus, OH 43215 90 West Broad Street c/o Policy Unit

FAIRFIELD COUNTY COMMISSIONERS

740-687-7190 / 614-837-0763 Lancaster, Ohio 43130-3879 210 East Main Street Room 301

Jacqueline D. Long, Clerk

November 3, 2000

Re: Columbus Metropolitan Facilities Plan Update

Dear Mayor Coleman:

Roberto regarding the Facilities Plan, we have reevaluated the information provided and our previous our support for the Columbus plan with the following comments noted. Fairfield County supports We are writing in regards to the proposed Columbus Metropolitan Facilities Plan Update. Based on regionalized efforts with surrounding entities when cost-effective to do so and without the recent discussions between our Sanitary Engineer, Kerry Hogan, and Mr. John Doutt and Ms. Cheryl comments dated October 17, 2000. We wish to withdraw our previous comments and hereby extend requirement for annexation in order to receive water and sewer services.

In regards to the proposed Plan, we have the following comments.

Columbus system. If an agreement is not satisfactorily negotiated and executed, the County will continue to serve this area. In this case, we trust the City of Columbus would support the Violet Township. This map provides the intended area that would be served as part of an be revised to agree with the attached TRWRF Service Area Map. It is our understanding that Fairfield County will continue to service this area until such time that an Agreement between Fairfield County and the City of Columbus is reached for wastewater services into the We are aware that our Sanitary Engineer has been meeting with your staff in regards to connecting the Fairfield County Tussing Road Water Reclamation Facility into the Columbus sanitary sewer system. We support this effort to regionalize wastewater services in northern Violet Township and hope your staff will continue to work toward an equitable agreement over the next several months. We are attaching a copy of the service area map for northern Agreement with Columbus. We therefore request that the Columbus Facilities Plan boundary County's efforts to provide wastewater services to the area.

Lisa M. Kessler Commissioner

Commissioner Allan Reid

Judith K. Shupe

Commissioner

Page Two November 3, 2000

- Facility. We understand that some of the area intended to be served by this plant may overlap facilities serving their communities. We understand the Columbus Facilities Plan will include these areas being served by either Pickerington, Canal Winchester or Fairfield County at the with areas that Pickerington and Canal Winchester may plan to serve in the future. Upon the representations of City of Columbus representatives, we understand that these areas of overlap systems. At such time in the future that Columbus has sanitary facilities available to serve this area, Fairfield County and the City of Columbus should work cooperatively on services in the probably not have sanitary sewer services available to this area within the 20 year planning We ask that you expand the southeastern boundary of the Facilities Planning Area to recognized and include the full service area for our Little Walnut Regional Water Reclamation will be identified as nonexclusive, potential service areas for all three centralized sewer In regards to southern Violet Township in Fairfield County, we understand that Columbus will period. Fairfield County has recently completed construction of the Little Walnut Regional Water Reclamation Facility to serve southern Violet Township and northern Bloom Township. The City of Pickerington and the Village of Canal Winchester have regional treatment present time. We are attaching a service area map for the Little Walnut facility for your use.
- The Columbus Facilities Plan essentially prohibits Alternative Wastewater Treatment Systems boundary will have no effect on the choices that Fairfield County makes for sewer services outside of the Facilities Planning Area Boundary. We believe there are instances where within the Planning Boundary. Fairfield County agrees to allow the prohibition of Alternative Wastewater Treatment Systems in the areas within the Facilities Planning Boundary, in an effort to encourage regionalized wastewater treatment systems. We understand that agreeing to prohibit Alternative Wastewater Treatment Systems within the Facilities Planning Area Alternative Systems may be the most cost-effective and environmentally sound option, such as golf course communities, where public sewers are not available. We do not plan to prohibit Alternative Wastewater Treatment Systems in other parts of Fairfield County at this time.

services in Fairfield County to the Board of Commissioners, we respectfully request to be involved in any further revisions or discussions regarding the Facilities Plan Update that involves this County. Fairfield County reserves the right to comment further on the Columbus Metropolitan Facilities Plan We appreciate the opportunity to comment on the proposed Columbus Metropolitan Facilities Plan. Since Chapter 6117 of the Ohio Revised Code delegates responsibility for wastewater treatment and any 208 Areawide Waste Treatment Management Plan developed for the Central Ohio Region.

Page Three November 3, 2000

We look forward to working with the City of Columbus, other governmental entities, and Ohio EPA on wastewater treatment planning in Central Ohio.

Sincerely,

Allan Reid

Judith K. Shupe

K. Hogan, Sanitary Engineer B. McCarthy, Ohio EPA-CDO L. Morris, Ohio EPA-DSW 8



To:

Cheryl Roberto

From:

Laura Flynn, Darby Watershed Program Manager; Tim Richardson, Urban

Coordinator

Date:

07/06/00

Re:

Comments on Columbus Metropolitan Facilities Plan Update

The Nature Conservancy, Ohio Chapter endorses The City of Columbus' proposal to implement watershed planning, through a 208 facilities plan process, in the environmentally sensitive western Franklin County portion of the Big Darby Creek watershed. The city's proposal to expand the Environmental Conservation District (designated Environmentally Sensitive Development Area) to include all of the County's Darby Watershed is a significant step in the effort to protect this nationally recognized natural resource.

TNC recommends the critical issue of impervious surfaces and their permanent impact on natural aquatic systems (when approaching 10%) be included in the mix of criteria and conditions when considering development potential within the watershed.

We congratulate you on your efforts to achieve regional support for the facilities plan update. We believe the update (our comments specifically focus on the Darby Watershed component) and subsequent policies associated with public services (including treatment of wastewater and related land use issues), can only be accomplished through a truly collaborative, multi-jurisdictional process.

We appreciate the City of Columbus' support of Darby preservation efforts in the past. Based on our many years experience in working with all of the political jurisdictions and public agencies involved in West Franklin County, we are convinced there are many commonly held beliefs relative to protection of the Darby's natural resources. We believe an inclusive 208 planing process will result in a significant plan for all political jurisdictions and Central Ohio's unique natural resource. Time is of the essence. As you are aware, development pressures are greater than ever. Unless the Franklin County community of governments develops meaningful, comprehensive growth strategies designed to protect the Darbys, a major part of that natural system will be lost forever.

October 16, 2000

Ms. Cheryl Roberto
Office of the Mayor
City of Columbus
90 W. Broad Street
Columbus, Ohio 43215

Re: Comments of the Building Industry Association on The Columbus Metropolitan Facilities Plan Update

Via Facsimile: 645-7668

Dear Ms. Roberto:

The Building Industry Association of Central Ohio (BIA) appreciates the opportunity to provide these comments on the Columbus Metropolitan Facilities Plan Update. The BIA has been in existence since 1943. We are a trade association made up of builders, developers, and allied businesses serving the residential construction industry with more than 1,100 members in the central Ohio region.

The BIA is supportive of the Facilities Plan and its approach to servicing growth, while protecting natural resources, the environment and human health in our community for the next 20 years.

The BIA appreciated our recent opportunities to meet with City officials to provide direct input on the Plan Update. The frank discussion of the details of the Plan, the review of the City's Capital Improvements Plan for sanitary sewer projects, the discussions of the City's policy on lift stations, alternative treatment systems and water line extensions were enlightening and fruitful. From our meetings with the City, the BIA offers the following specific comments on the Facilities Plan Update:

The BIA applauds the City's commitment to greater flexibility in allowing the use of lift stations. The more general use of lift stations, with appropriate maintenance and back-up specifications, is a more cost effective method of extending the life of the existing system without building more expensive gravity sewer lines in many situations, particularly where land topography is challenging. Greater lift station utilization may also allow land to be developed for housing inside the service territory that has been cost prohibitive to develop in the past. This will also help our region

manage growth by making inward growth more viable. Our organization looks forward to working with the City to establish guidelines and technical specifications to ensure the reliability and safety of lift stations.

We share the City's conviction that central sewer is preferable to alternative systems. But if central sewer is not available, alternative waste water systems, including land application systems, should not be prohibited. Like any wastewater treatment plant, these alternative systems are safe and cost-effective, when properly built, operated and maintained. They have a successful track record in central Ohio and around the country.

These systems, maintained by a central authority and built and operated per appropriate specifications, are certainly superior to homeowners maintaining an equivalent number of individual septic systems.

The BIA disagrees with the statements in the initial Facilities Plan document that indicate that these systems pose an environmental threat. This has not been the history of these systems, in central Ohio, Chicago, California or other jurisdictions. It is inappropriate to ban the use of these systems within the territory altogether. If the City of Columbus will not or cannot assume the lead in sewer construction and service, these alternative solutions will be the only way to service growth, which will certainly occur.

Once again, the BIA and its Developers' Council wish to express its support for the Columbus Facilities Plan Update. We are thankful for the meetings with you, Steve Campbell, Director John Doutt, and Steve Salay and look forward to continued positive dialogue.

Sincerely,

Thomas | Hart Executive Director